

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CATHERINE SHANAHAN, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff)	
)	
v.)	Case No.1:19-cv-3788
)	
NATIONAL AUTO PROTECTION CORP.,)	Honorable Robert John Blakey
et al.,)	
)	
Defendants.)	

**DEFENDANTS MATRIX FINANCIAL SERVICES, LLC
AND MATRIX WARRANTY SOLUTIONS, INC.’S
MOTION TO DISMISS PLAINTIFF’S SECOND AMENDED COMPLAINT**

Defendants Matrix Financial Services, LLC (“Matrix Financial”) and Matrix Warranty Solutions, Inc. (“Matrix Warranty,” collectively with Matrix Financial, “Matrix Defendants”), by and through undersigned counsel, move to dismiss Plaintiff’s Second Amended Complaint for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2). Defendants contemporaneously submit and file herewith their Memorandum in Support of this motion.

WHEREFORE, for the reasons stated in their Memorandum in Support of their Motion to Dismiss, the Matrix Defendants respectfully request that the Court grant their Motion to Dismiss and enter an order dismissing the Second Amended Complaint as to the Matrix Defendants, and further grant them any such other relief that this Court deems equitable and just.

Dated: January 2, 2020

Respectfully submitted,

MATRIX WARRANTY SOLUTIONS, INC.

and

MATRIX FINANCIAL SERVICES, LLC

By Counsel

/s/ Joseph P. Bowser

Joseph P. Bowser, *pro hac vice*

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Counsel for Defendants

Matrix Warranty Solution, Inc.. and

Matrix Financial Services, LLC

CERTIFICATE OF SERVICE

I certify that on this 2nd day of January, 2020, I caused a copy of the foregoing document to be served via ECF on all parties entitled to be receive notice.

/s/ Joseph P. Bowser

Joseph P. Bowser